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19 COMMONWEALTH LAND TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**

26 **DISTRICT OF NEVADA**

27 BANK OF NEW YORK MELLON,

28 Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:21-CV-00350-GMN-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
THE COMPLAINT (ECF No. 1)**

FIRST REQUEST

29 COMES NOW defendant Commonwealth Land Title Insurance Company
30 (“Commonwealth”) and plaintiff The Bank of New York Mellon (“BONY”), by and through their
31 respective attorneys of record, which hereby agree and stipulate as follows:

32 1. On March 1, 2021 BONY filed its complaint in the Eighth Judicial District Court
33 for the State of Nevada;

2. On March 1, 2021, Commonwealth removed the instant case to the United States District Court for the State of Nevada (ECF No. 1);

3. Commonwealth's response to BONY's complaint is currently due on April 15, 2021;

4. Counsel for Commonwealth requests a 35-day extension, through and including Thursday, May 20, 2021 for Commonwealth to file its responses to BONY's complaint to afford Commonwealth's counsel additional time to review and respond to BONY's complaint.

5. Counsel for BONY does not oppose the requested extension;

6. This is the first request for an extension made by counsel for Commonwealth, which is made in good faith and not for the purposes of delay.

7. This stipulation is entered into without waiving any of Commonwealth's objections under Fed. R. Civ. P. 12.

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1 **IT IS SO STIPULATED** that Commonwealth's deadline to respond to the complaint is
2 hereby extended through and including Thursday, May 20, 2021.

3 Dated: April 8, 2021

SINCLAIR BRAUN LLP

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5 By: /s/-Kevin S. Sinclair
6 KEVIN S. SINCLAIR
7 Attorneys for Defendants
8 COMMONWEALTH LAND TITLE
9 INSURANCE COMPANY


8 Dated: April 8, 2021

WRIGHT FINLAY & ZAK, LLP

10 By: /s/-Darren T. Brenner
11 DARREN T. BRENNER
12 Attorneys for Plaintiff
13 THE BANK OF NEW YORK MELLON

13 **IT IS SO ORDERED.**

14 Dated April 13, 2021.

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17 BREND A WEKSLER
18 UNITED STATES MAGISTRATE JUDGE
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